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COUNSEL FOR THE CHAPTER 7 TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	
	§	
TUESDAY MORNING CORPORATION,	§	CASE NO.: 23-90001-ELM
ET AL., ¹	§	
	§	In Proceedings Under Chapter 7
Debtors.	§	
	§	(Jointly Administered)

SHAWN K. BROWN,	§	
Chapter 7 Trustee,	§	
	§	
Plaintiff,	§	
	§	
v.	§	ADVERSARY NO. 25-09013
	§	
FRED HAND,	§	
	§	
Defendant.	§	

**STIPULATION EXTENDING DEFENDANT'S
DEADLINE TO RESPOND TO TRUSTEE'S COMPLAINT**

¹ The Debtors in these Chapter 7 Cases, along with the last four digits of each Debtor's federal tax identification number, include: Tuesday Morning Corporation (8532) ("TM Corp."); TMI Holdings, Inc. (6658) ("TMI Holdings"); Tuesday Morning, Inc. (2994) ("TMI"); Friday Morning, LLC (3440) ("FM LLC"); Days of the Week, Inc. (4231) ("DOTW"); Nights of the Week, Inc. (7141) ("NOTW"); and Tuesday Morning Partners, Ltd. (4232) ("TMP").

Plaintiff Shawn K. Brown, Chapter 7 Trustee (“**Trustee**” or “**Plaintiff**”), with the agreement of Defendant Fred Hand (“**Defendant**”) files this *Stipulation Extending Defendant’s Deadline to Respond to Trustee’s Complaint* (the “**Stipulation**”), hereby agreeing that the deadline for Defendant to answer or otherwise respond to the Plaintiff’s *Original Adversary Complaint* (“**Complaint**”) [Dkt. No. 1] is extended through and including May 16, 2025, and would show the Court as follows:

1. On or about February 13, 2025, the Trustee filed his Complaint, asserting certain claims against the Defendant.
2. A copy of the Complaint and Summons was mailed to Defendant on February 14, 2025 by first class mail postage prepaid to 3140 Harvard Ave, Unit 1408, Dallas, TX 75205.
3. Pursuant to Federal Rule of Bankruptcy Procedure 7012(a), defendants have thirty (30) days from the date of service to file an answer unless the court prescribes a different time.
4. Accordingly, the Defendant’s deadline to respond to Plaintiff’s Complaint is Monday March 17, 2025.
5. Counsel for the Trustee and the Defendant have conferred and are in discussions regarding potential resolution of the Trustee’s claims. To facilitate settlement discussions, the Trustee and Defendant hereby agree that the Defendant shall have until May 16, 2025 to answer or otherwise respond to the Complaint.
6. If the parties submit settlement papers to the Court pursuant to Bankruptcy Rule 9019 within this timeframe, the answer/response date shall automatically extend during the customary notice and hearing period for such motions.
7. This stipulation is not made for purpose of delay, but only so that the parties may

have a full and fair opportunity to pursue an efficient resolution of certain claims in this case prior to incurring potentially unnecessary time and expenses.

Dated: March 13, 2025

/s/ Curt D. Hochbein

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 13, 2025, a true and correct copy of the foregoing document was electronically filed and served via electronic mail on the parties appearing in this adversary proceeding.

/s/ Curt D. Hochbein
Curt D. Hochbein